
EXHIBIT A

El Paso County - 327th District Court

Filed 10/15/2018 9:13 AM
Norma Favela Barceleau
District Clerk
El Paso County
2018DCV3840

IN THE _____ JUDICIAL DISTRICT COURT
COUNTY COURT AT LAW NUMBER _____
EL PASO COUNTY, TEXAS

MARY YUENGEL,

PLAINTIFF,

vs.

CAUSE No.: _____

G4S SECURE SOLUTIONS (USA) INC.,

DEFENDANT.

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF THIS COURT:

COMES Now, MARY YUENGEL, PLAINTIFF, by and through her attorney of record, John P. Valdez of Davie & Valdez, P.C., and files Plaintiff's Original Complaint, and for cause of action would show the Court as follows:

DISCOVERY CONTROL PLAN

1. Discovery will be conducted under Level III of Rule §190.4 of the TEXAS RULES OF CIVIL PROCEDURE.

PARTIES TO THIS ACTION

2. Plaintiff is an individual that resides in El Paso County, Texas.
3. Defendant G4S Secure Solutions (USA) Inc., is a Florida corporation doing regular and systematic business in the State of Texas. Said defendant may be served with process by serving its registered agent: Prentice Hall Corp. System at 211 E. 7th Street, Suite 620, Austin, Texas 78701.

JURISDICTION AND VENUE

4. Venue is proper in El Paso County, Texas because the incident made the subject matter of this lawsuit occurred in El Paso County, Texas.

FACTS

5. Plaintiff began working for Defendant on or around January of 2016 as a security officer. Plaintiff is a 57 year-old female. At all relevant times, Defendant was a subscriber of the Texas Workers' Compensation system and was a covered employer under Chapter 21 of the Texas Labor Code.

6. Plaintiff suffered an on-the-job injury while working for Defendant and reported the injury to Defendant. As a result of the injury Plaintiff sought workers' compensation benefits in the form of medical treatment, which she received. Plaintiff was released with restrictions. As a result of the on-the-job injury, Defendant began to treat Plaintiff differently and exhibited a

negative attitude toward her. In addition, Arliss Rhodes, Plaintiff's supervisor, told Plaintiff that he was in trouble with his superiors because of Plaintiff's workers' compensation claim.

7. On or around November 22, 2016, Plaintiff's co-worker Officer Dwayne Grey, who is a younger male, was to take Plaintiff's place at the end of her shift. Plaintiff could smell alcohol on Officer Grey, so she reported this to her supervisor, Arlis Rhodes, the next day.

8. On December 15, 2016, Arlis Rhodes arrived at the Chase Tower at 201 East Main Drive in El Paso, Texas to speak with Plaintiff about Officer Dwayne Grey. Plaintiff was presented with a write up stating that she did not report Officer Grey soon enough. Plaintiff refused to sign the write up. No know reprimand or disciplinary action was given to Officer Dwayne Grey.

9. Plaintiff was terminated on December 29, 2016. After her termination, Plaintiff's position was filled by a male that is younger than her.

CAUSE OF ACTION

9. Plaintiff brings this lawsuit against Defendant for age, sex, and disability discrimination and retaliation under Chapter 21 of the Texas Labor Code and Tex. Lab. Code §451. More than 180 days prior to the filing of this lawsuit Plaintiff timely filed a complaint with the Texas Workforce Commission, Civil Rights Division. All conditions precedent to the filing of this lawsuit have been met.

EQUITABLE RELIEF

10. Plaintiff further seeks equitable relief in that Defendant be enjoined from engaging in unlawful practices and continuing other unlawful practices in the future.

DAMAGES

11. As a result of the wrongful termination of Plaintiff as described above, Plaintiff has suffered and continues to suffer from the following:
 - a. Lost wages and loss of wage earning capacity, past and future;
 - b. Mental anguish, past and future; and
 - c. Other damages.
12. The actions of Defendant were of the type and kind that should result in an award of punitive damages against Defendant.
13. Plaintiff is entitled to an award of attorney fees.
14. Claimant seeks monetary relief over \$200,000.00, but not more than \$1,000,000 and the damages sought are within the jurisdictional limits of this court.

JURY REQUEST

15. Plaintiff requests a Trial by Jury on all issues as set forth herein.

REQUESTS FOR DISCLOSURE

16. Pursuant to TEXAS RULES OF CIVIL PROCEDURE, you are requested to disclose the information set out within §194.2, subsections (A) through (L) within 51 days of service of this Complaint.

PRAYER

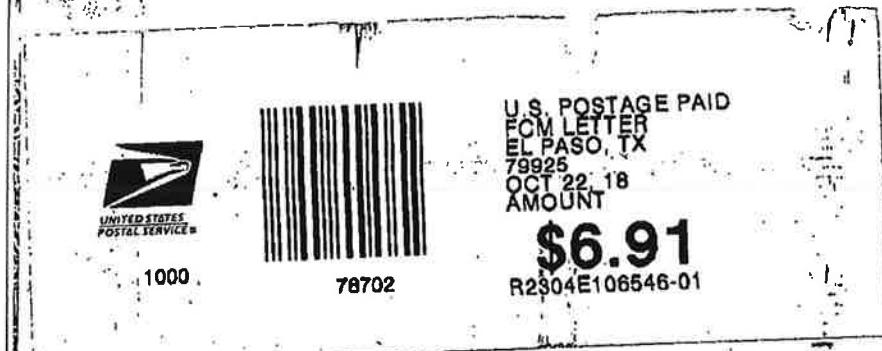
17. WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests that Defendant be cited to appear and answer and that on final trial judgment be entered against Defendant for all relief requested as follows:

- a. Judgment against Defendant for actual damages in an amount that is within the jurisdictional limits of this Court.
- b. Pre and post-judgment interest, as described by law, until paid;
- c. Costs of suit;
- d. Attorney fees;
- e. Punitive damages; and
- f. Such other and further relief, general and special, at law or at equity, to which Plaintiff may be justly entitled.

Respectfully submitted,

DAVIE & VALDEZ P.C.
1801 N. Stanton
El Paso, Texas 79902
(915) 838-1100

By: John P. Valdez
JOHN P. VALDEZ
State Bar No. 24047021
john@davievaldez.com



CERTIFIED MAIL®

At Your SERVICE PROCESS SERVIC
18221 Stoneway Dr.
El Paso, Texas 79925



7016 0910 0000 8589 0716

G4S SECURE SOLUTIONS (USA) INC.
ATTN: Prentice Hall Corp. System
2811 E. 7th Street, Suite 620
Austin, Texas 78702

**RETURN RECEIPT
REQUESTED**

SK, LTD
78702
05

Norma Favela Barceleau

District Clerk

BEST SICK
El Paso County

El Paso County
2018DCV3840

—2018DCVJS840

CAUSE NUMBER (FOR CLERK USE ONLY): _____ **COURT (FOR CLERK USE ONLY):**

STYLED Mary Yuengel v. G4S Secure Solutions (USA) Inc.

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

THE STATE OF TEXAS

NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you, or your attorney, do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you."

TO: **G4S Secure Solutions (USA) Inc.**, who may be served with process by serving its registered agent, Prentice Hall Corp. System at, 2211 E. 7th Street, Suite 620, Austin, TX 78701

Greetings:

You are hereby commanded to appear by filing a written answer to the Plaintiff's Original Petition at or before ten o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation before the Honorable **327th Judicial District Court, El Paso County, Texas, at the Court House of said County in El Paso, Texas.**

Said Plaintiff's Petition was filed in said court on this the 15th day of October, 2018, by Attorney at Law, JOHN P. VALDEZ, 1801 N. STANTON, EL PASO, TX 79902 in this case numbered **2018DCV3840** on the docket of said court, and styled:

Mary Yuengel
vs
G4S Secure Solutions (USA) Inc.

The nature of Plaintiff's demand is fully shown by a true and correct copy of the Plaintiff's Original Petition accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at El Paso, Texas, on this the 18th day of October, 2018.

Attest: NORMA FAVELA BARCELEAU, District Clerk, El Paso County, Texas,

CLERK OF THE COURT
NORMA FAVELA BARCELEAU
District Clerk
El Paso County Courthouse
500 E. San Antonio Ave, RM 103
El Paso Texas, 79901

By Stephanie V. Aguilar, Deputy

CERTIFICATE OF DELIVERY BY MAIL

ATTACH
RETURN RECEIPTS
WITH
ADDRESSEE'S SIGNATURE
Rule 106 (a) (2) the citation shall be served by mailing to the defendant by Certified Mail return receipt requested, a true copy of the citation Sec. 17.027 Rules of Civil Practice and Remedies Code if not prepared by Clerk of Court.

Joel Payin Process Server
NAME OF PREPARER
10221 STONEWAY DR. TITLE
ADDRESS
EL PASO STATE TEXAS ZIP 79925



I hereby certify that on the 22nd day of OCTOBER, 2018, at 5:00 PM I mailed to G4S SECURE SOLUTIONS (USA) INC., BY DELIVERING TO ITS REGISTERED AGENT, PRENTICE HALL CORP. SYSTEM Defendant(s) by registered mail or certified mail with delivery restricted to addressee only, return receipt requested, a true copy of this citation with a copy of the Plaintiff's Original Petition attached thereto.

JLP SCH# 2253, EXP. 8/31/19
PROCESS SERVER FOR AT YOUR SERVICE PROCESS SERVER
TITLE

RETURN OF SERVICE

Delivery was completed on _____, delivered to _____
as evidence by Domestic Return Receipt PS Form 3811
attached hereto.

The described documents were not delivered to the named recipient. The certified mail envelope was returned
undelivered marked _____

This forwarding address was provided: _____

Forwarded to no
El Paso County, Texas
By _____
Deputy District Clerk
OR

Name of Authorized Person

By: _____

VERIFICATION BY AUTHORIZED PERSON

State of Texas

County of El Paso

Before me, a notary public, on this day personally appeared _____, known to me to be the person
whose name is subscribed to the foregoing Return of Service, and being by me first duly sworn, declared, "I am
disinterested party qualified to make an oath of that fact and statements contained in the Return of Service and true and
correct."



Subscribed and sworn to be on this _____ day
of _____, _____

Notary Public, State of _____
My commission expires: _____